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KALAMAZOO GAZETTE, MONDAY, OCTOBER 18, 1999 **C1**

Mill pond cleanup only a start

River deserves a continued attack on PCBs

BY CHARLES MEHNE, DVM

Hurrah! True progress is occurring on the Allied Paper/Portage Creek/Kalamazoo River Superfund Site. Thanks to a very active and informed public, and much hard work on the part of the Michigan Department of Environmental Quality (MDEQ) and the Environmental Protection Agency (EPA) we are finally getting ready to clean up this site.

The EPA has done a stellar job cleaning up Bryant Mill Pond, the source of PCBs farthest upstream (PCBs are polychlorinated biphenyls

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which were a waste byproduct of the local paper mills from the mid 1950s to the early 1970s), not only staying under budget and on schedule but also exceeding promised cleanup criteria. The cleanup of Bryant Mill Pond should be used as a model for technique for cleanup of the rest of the river, as well as for the hiring of local workers.

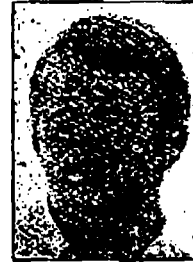
Only 400,000 pounds of PCBs to go! The Kalamazoo River Superfund site, consisting of 80 river miles and a lot of PCBs, should be an excellent long-term employment opportunity for people of the Kalamazoo River watershed.

Another sign of progress is the formulation of cleanup levels for this site: 0.12 parts per million (ppm) of PCBs in the sediments or soils that come in contact with

water and are subject to erosion or flooding, and 0.7 ppm for the soils that are stable, high, and dry.

These levels are the bare minimum needed to protect the long- and short-term health of both humans and the environment. The EPA and MDEQ together derived these levels from mink studies on this site done by MDEQ. MDEQ based this field work on mink studies done by Dr. John Gelsy's lab at Michigan State University.

The field studies agree with the laboratory studies, and they both agree with the samples that I have pulled on bald eagles, great horned owls, redtailed hawks, great blue



Charles Mehne

on PCB problem

herons, redwing blackbird, robins, and yellow warblers. We have more than enough data to set realistic cleanup levels.

There are only two problems holding up the cleanup at this point. Problem number one is that we still do not have enough data to know the true extent of PCBs on this site, especially from Lake Allegan down to Lake Michigan.

Problem number two is if the paper companies which polluted this site do not want to do the proper cleanup. These companies would then slow the process down by offering ridiculous sampling plans (which they are doing now) or slow down the paper work.

The paper companies' other option is to go political and lobby Governor Engler to step in on this site. If that happens everything could fall apart. Remember that big

money talks loudly in an "ideal" world, good science should drive this cleanup, but this is Michigan and the public needs to be ever vigilant of Lansing's politics. The best cure for a political disease is letters from the public to MDEQ, the governor, and your elected officials.

It is very important to remember that the work on this site is not being done with state or federal money. It is being paid for by the potentially responsible parties, as it should be. This is our river and she has come a long way since the 1950s and 1960s. It is now time to bring her health up to where she should be, as the cleanest river in southern Michigan. Let the cleanup begin!

CHARLES MEHNE, is a Kalamazoo veterinarian who has extensively studied the health status of area wildlife.

From Charles

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KALAMAZOO GAZETTE 4/18/97

plan set on Bryant Mill Pond

*Allied Paper will pay
up to \$5.5 million
to move contaminated soil
from Portage Creek
to adjacent landfill.*

BY BILL KRASEAN
KALAMAZOO GAZETTE

Almost 20 years after PCBs were first found in the former Bryant Mill Pond in Kalamazoo, a plan finally has been approved to clean up the site, which is the most contaminated section of the Kalamazoo River and Portage Creek in Kalamazoo County.

PCB-tainted sediments will be dug up beginning next spring and buried in an adjacent landfill under an agreement announced Friday by the Environmental Protection Agency, the Michigan Department of Environmental Quality and representatives of Allied Paper Inc./HM Holdings.

Under the agreement, Allied Paper will pay up to \$5.5 million to have sediments from about 22 acres in Portage Creek and the adjacent flood plain moved to a landfill on higher ground on the 51-acre site.

All landfills on the site, located south of Alcott Street and east of Burdick Street in Kalamazoo, would then likely be covered to keep rain and melting snow from seeping into the PCB-contaminated clay and getting into the creek.

"It's a win-win-win situation," said Scott Cornelius of the MDEQ Superfund Division, who has been overseeing work on the Superfund site for the state. "Our goal is to cut off all sources of PCBs upstream and work our way down. I'm very happy the way things are working out."

An EPA contractor who examined the site earlier this summer had recommended excavating up

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CLEANUP

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to 100,000 cubic yards of polychlorinated biphenyl-contaminated sediments. The contractor's proposal was similar to one being drafted by Blackland, Bonick & Lee, an engineering and scientific firm employed by Allied Paper, according to Mark Brown, BB&L vice president.

Bryant Mill Pond, now drained, is part of a 35-mile-long zone of contamination that is on a federal Superfund priority list of contaminated sites. The Allied site is considered the most contaminated portion of the Superfund site.

EPA officials reported that PCB residues have been found in the 22-acre former pond to a depth of about six feet. PCB-tainted soils have eroded from the site into Portage Creek, they said, and into the Kalamazoo River to Lake Michigan.

Most of the PCBs, according to the EPA, are tightly bound to the clay and do not appear to be a threat to ground water under the site. Brown said PCB concentrations are

as high or higher in the landfills, but are not leaching into the creek as they are from the creek sediments. The landfills have about 10 times the volume of PCB-contaminated clay as the pond site, he said.

Yet to be determined, Brown said, is what will be done with the entire 51-acre site as part of a long-term effort to monitor the contaminated soils, ground water and the creek to ensure that no PCBs enter the water system.

Cornelius said the state and Allied Paper had been working toward a solution when the EPA, under pressure from several area citizens' groups, stepped in to speed things up. The EPA, he said, can act more quickly in situations considered urgent.

Judy Mayo, chairman of the Kalamazoo Environmental Council, said she was pleased with the settlement. She praised Kalamazoo County Commissioner Mary Fowers for her efforts to get the EPA involved. The environmental council represents seven area environmental groups and some 10,000 area residents. The council and other groups wrote letters to the EPA earlier this year urging quick action.

"Our concerns do not stop here," Mayo said. "But this is the most contaminated site and farthest upstream, and it makes sense to start here."

The former Bryant Mill Pond site is one of five landfills in the Superfund zone. "By the end of the year we should have a pretty good idea about four of the five sites," Cornelius said in September.

Allied Paper Inc./HM Holdings is one of four paper companies identified as having contributed to the pollution in the Superfund site. The others are Georgia-Pacific Corp., Simpson Paper Co. and James River Corp. The four are starting study costs - now more than \$12 million - for the Superfund site.

Bryant Mill made paper and recycled waste paper for about 84 years at a site south of Alcott Street and east of Burdick Street in Kalamazoo.

Final proposals on how to remediate the King Highway landfill proposal should be issued later this month, Cornelius said, the 12th Street landfill proposal by December, the Willow Boulevard/A-Site by April 1998 and the Allied Paper 51-acre site by July 1998.

cleanup facts

Project: Remove about 100,000 cubic yards of PCB-tainted sediments from the former Bryant Mill Pond and bury them in adjacent landfill.

Location: Allied Paper Inc./HM Holdings, south of Alcott Street and east of Burdick Street in Kalamazoo.

Cost: \$5.5 million. When Beginning next spring.

Finals: King Hwy 1
Late Oct/Nov '97
12th Street
in December '97
Willow Blvd/A
April 1998
Allied 51-acre
July 1998

dig & haul
to higher
ground south

all landfills
capped

Attention Bill MUNO EPA

3
From
CHARLES MEANE
616344 5663

PLEASE NOTE strong public support
FOR option #4 - ~~REMOVAL AND~~
ONSITE REMOVAL - to LAGOONS

THEN CAP. I TALKED TO COUNTY
COM. MARY POWERS LAST NIGHT AND WE
ARE ORGANIZING AN AGGRESSIVE RESPONSE
IF AILED PAPER DOES NOT GO WITH
REMOVAL [option 4 or 5], LEAVING PCB'S IN
FLOOD PLAIN UNACCEPTABLE. THANKS FOR
YOUR FINE WORK!

CHUCK.

Permanent solution is cheaper for PCBs in Bryant millpond

BY CHARLES J. MEHNE

Once again it is time to write on the Kalamazoo River/Allied Paper Superfund Site. At the head of this site is the still active PCB-polluting Bryant Mill Pond, the property of Allied Paper. Both EPA and MDEQ (formerly MDNR) have known for 40 years of this illegal activity.

Thanks to the aggressive action of our County Commissioner Mary Powers, Kalamazoo Environmental Council Chairperson Judy Mayo, Kalamazoo River Remedial Action Plan Chairperson Bob Beck, Kalamazoo River Protection Association Chairperson Dayle Harrison and scores of local people this problem may finally get solved.

In a draft document released Sept. 2, EPA proposes a permanent solution to this site, namely removal of the PCB and placing it in the lagoons on site, stabilizing and capping these same lagoons. As it has been declared an imminent and substantial threat to both human and environmental health, the EPA has moved forward on the cleanup of this site.

Regrettably the EPA is only willing to push an interim (temporary) cleanup/stabilization at this time with option on a permanent cleanup if Allied Paper so desires. Wednesday, EPA, MDEQ, Allied Paper's representative Bland Bouck and Lee (BB&L) will have a closed meeting on this draft document.

If this group so chooses, Allied Paper can go with the permanent option EPA is recommending or an interim stabilization in place and come back later for a more permanent cleanup.

The interim option will cost approximately \$350,000 to set up and an annual maintenance cost of \$270,000 according to EPA, plus a large amount of money to lawyers and consultants to fight off the well-organized public outcry that will follow. In 15

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years this cost will amount to over \$4 million plus consultants and lawyer fees.

The cleanup that EPA wants will cost \$3.5 million to set up, no additional charges for lawyers and consultants, and no public outcry. Both options will require onsite water monitoring, both options will be paid for by Allied Paper.

The EPA-backed option will withstand a 100 year flood event because by law it will be located out of the 100 year flood plain. The interim option would probably not withstand a 50 year or 25 year flood event because it is located in the annual flood plain.

Gosh, this is a no brainer! The EPA permanent option is cheaper after about 12 to 15 years and will do the job. The interim option is more expensive after 15 years or the first major flood down Portage Creek, whichever comes first, and does not protect human or environmental health effectively.

Please, Allied Paper, do not make the consultants and lawyers rich. Do the smart thing and choose the permanent cleanup that EPA is recommending. Allied Paper, you have the equipment on site to handle the PCBs and do the landfill. You would even have public support!

So Allied Paper, this is your chance to prove to us what a good corporate citizen you are and remove the PCBs, place them in a appropriate landfill on site, cap it and monitor our precious groundwater.

This would be a great beginning of the cleanup of the Kalamazoo River. Thank you for your time and consideration.

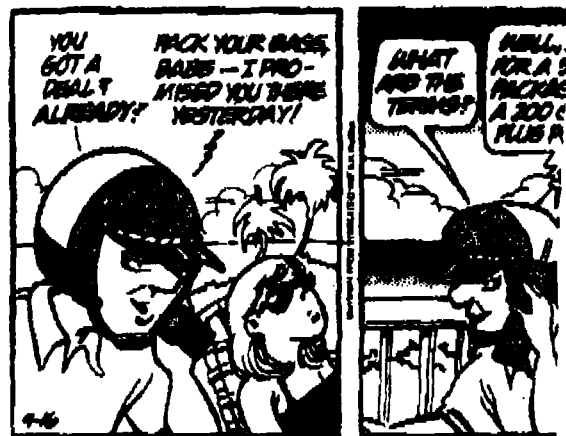
CHARLES J. MEHNE is a Kalamazoo veterinarian.

IN FROM YOU

elcomes short, to the point, Letters any timely, interesting and provocative. They must be signed with a I include address and daytime telephone number. If space limitations, letters should be subject to editing. Send to Letters to the Editor, P.O. Box 2007, Kalamazoo, MI, addressed to Letters to the Editor at to kgletters@aol.com via e-mail. This e-mail and viewpoint articles only. come the property of the Kalamazoo Gazette; submissions may be edited and otherwise re-used in any medium.

DOONESBURY

By Garry Trudeau



Kalamazoo Gazette

Friday, September 12, 1997

Front Page

Cleanup proposed for Bryant Mill site

EPA wants to excavate up to 100,000 yards of soil and seal it in a landfill on the property

BY BILL KRASEAN
KALAMAZOO GAZETTE

Federal officials are recommending excavating up to 100,000 cubic yards of PCB-contaminated soils at the former Bryant Mill Pond in Kalamazoo and sealing the materials in a landfill on the same property.

The project, which could cost up to \$3.57 million, is one of five cleanup options being considered by the Environmental Protection Agency.

The alternatives are summarized in a report to be discussed next week by the EPA, Michigan Department of Environmental Quality and representatives of the paper companies which contributed to contamination of Portage Creek and the Kalamazoo River.

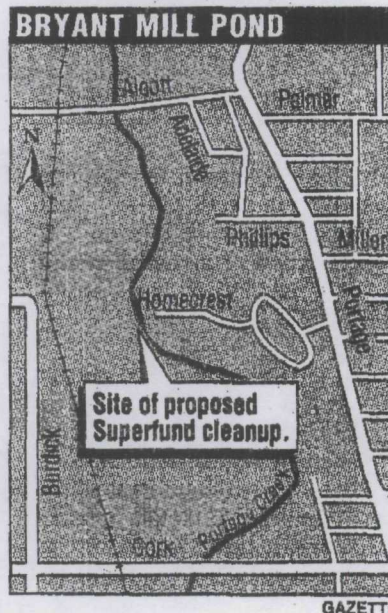
Soils tainted with polychlorinated biphenyls have eroded from the Bryant Mill site into Portage Creek, EPA officials said, and into the Kalamazoo River and Lake Michigan.

Bryant Mill Pond, now drained, is part of a 35-mile zone of contamination that is on a federal Superfund priority list of contaminated sites.

Bryant Mill Pond, south of Alcott Street and east of Burdick Street, is considered the most contaminated portion of the Superfund site.

EPA officials said PCB residues have been found on about 22 acres, reaching a depth of about 6 feet.

Surface soils on the site have PCB concentrations of at least 175 parts per million while sediments



downstream from the Bryant Mill dam exceed 500 parts per million, according to the EPA.

Bryant Mill is now part of Allied Paper Inc./HM Holdings, one of four paper companies identified as having contributed to pollution in the Superfund site.

The others are Georgia-Pacific Corp., Simpson Paper Co. and James River Corp. The four are sharing study costs - now totaling more than \$10 million - for the Superfund site.

Bryant Mill made paper and recycled waste paper for about 94 years at the Kalamazoo site.

As early as the 1950s, state officials worried about paper company discharges into the Kalamazoo River. In 1951, the Michigan Water Resources Commission set rules

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- continued -

BRYANT

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restricting what could be discharged by Allied Paper, stipulations the company violated those guidelines in 1953, 1956, 1961, 1964, 1967 and 1968, according to state records.

The EPA said Allied in the 1950s may have daily discharged up to 156,000 pounds of clay paper wastes, which contained PCBs.

PCBs at the site, according to the EPA report, are likely confined to the clay near the surface and do not appear to be settling where they may threaten groundwater supplies.

They consider the site, however, an "imminent and substantial threat to human health and the environment, ..." primarily through exposure to PCBs by eat-

ing fish caught in the river.

PCBs have been found to interfere with reproduction among bald eagles, mink and some other species that live along the Kalamazoo River. A few human studies have found a weak link with slowed development in children exposed to PCBs and a recent National Cancer Institute study found an association between the level of PCBs in body tissue and a cancer called non-Hodgkin's lymphoma.

Under the EPA proposal, between 75,000 and 100,000 cubic yards of contaminated sediments would be excavated from the Bryant Mill site. The materials would be moved to a site on the property where they would be prevented from further leaching into the creek. The work, they said, could be completed over a couple months.